

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

In the Matter of the Search of:

309 Bradbury Drive, Columbia, South  
Carolina 29203 (TARGET LOCATION), and  
the person of Ta'Shaun Williams

Case No. 3:24-cr-00573

**Affidavit in Support of  
An Application for a Search Warrant**

I, Jordan Vaughan, a Special Agent with the United States Secret Service, being duly sworn, depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant of the premises known as 309 Bradbury Drive, Columbia, South Carolina 29203, (TARGET LOCATION), which is believed to contain evidence of wire fraud, mail fraud, and conspiracy to commit wire and mail fraud. **Attachment A** to this affidavit further describes the location to be searched, including the entire property located at 309 Bradbury Drive, Columbia, SC 29203 ("TARGET LOCATION") and the person of Ta'Shaun Williams (WILLIAMS), and any vehicles known to be utilized by WILLIAMS for contraband, evidence, fruits, and instrumentalities of violations of, 18 U.S.C. § 1343 (wire fraud), 18 U.S.C. § 1341 (mail fraud), and 18 U.S.C. § 1349 (conspiracy to commit wire fraud and mail fraud) (Target Offenses). **Attachment B** further describes the evidence sought pursuant to the search warrant and believed to be located at the TARGET LOCATION, and on devices associated with the TARGET LOCATION, including the mobile devices utilized by WILLIAMS—one of which has phone number (803) 457-0950, hereinafter DEVICE #1—and all electronic devices, including but not limited to desktop computers, laptop computers, printers that store data,

computer hard drives, and other identified cellular telephones utilized by WILLIAMS or his coconspirators. I submit that the below-described Target Offenses have been perpetuated and advanced by the use of electronic devices and such devices would contain evidence, fruits, and instrumentalities of violations of the Target Offenses.

2. This affidavit is based upon my personal knowledge, experience, and training, and other information developed during the course of this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Because I am submitting this Affidavit for the limited purpose of demonstrating probable cause to search the TARGET LOCATION and WILLIAMS' person, I have not included every fact known about this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that violations of Title 18, United States Code, Section 1343 (Wire Fraud), Title 18, United States Code, Section 1341 (Mail Fraud) and Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud and Mail Fraud) have been committed and that the TARGET LOCATION—including any electronic devices found at said location—and WILLIAMS' person contain evidence, fruits, and instrumentalities of this violation and contraband, as further described in Attachment B to this Affidavit.

3. I am a Special Agent for the United States Secret Service (USSS) and have been so employed since 2021. I am currently assigned as a Special Agent in the Columbia, S.C. Field Office. Among my duties as a Special Agent, I am charged with the investigation of financial crimes, including money laundering, identity fraud, credit card fraud, unlawful activity in or against any federally insured financial institution (bank fraud), electronic funds transfer frauds (wire fraud) and the manufacturing, possession and passing of counterfeit United States currency. As a Special Agent, I have been involved in several investigations involving various fraudulent schemes that resulted in the issuance of seizure warrants, search warrants, and arrest warrants.

4. I am familiar with the habits and practices of persons engaged in violations of mail fraud, wire fraud, and money laundering. I am also familiar with the efforts of such targets to avoid detection by law enforcement. I have actively participated in other searches and seizures, surveillance, intelligence analysis, conspiracy investigations, arrests, and interviews and interrogations involving mail fraud, wire fraud and money laundering.

5. As it relates to the requested search, based on my training and experience, and participation in mail fraud, wire fraud and money laundering investigations I know:

- a. Such fraud schemes are commonly organized using and facilitated by electronic devices such as cellular telephones and laptop/desktop computer. Co-conspirators commonly used such devices to engage in schemes such as the ones described in this affidavit that are coordinated and organized by multiple co-conspirators. This is shown in this particular investigation where the lead target described below commonly uses electronic equipment as do all other conspirators to facilitate this scheme.
- b. That persons involved in the fraud scheme of mail fraud and wire fraud conceal in secure locations, with ease of access, large amounts of currency and other proceeds of mail fraud and wire fraud and evidence related to obtaining, transferring, secreting, and spending of fraud transaction proceeds.
- c. That it is common for the persons involved with the fraud scheme of mail fraud and wire fraud to keep and maintain records and other evidence of mail fraud and wire fraud conduct at such locations.

6. This affidavit is based on my personal knowledge, information learned from discussions with other agents and law enforcement, information provided by Home Depot loss prevention agents, and from information derived from physical surveillance by officers and agents. All of the information contained herein is true to the best of my knowledge.

## **II. FEDERAL OFFENSES UNDER INVESTIGATION**

7. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C § 1343 (**wire fraud**), and 18 U.S.C § 1341 (**mail fraud**), and 18 U.S.C § 1349 (**conspiracy to commit wire and mail fraud**) have been

committed by WILLIAMS and that WILLIAMS is utilizing electronic devices to commit the Target Offenses.

8. I respectfully submit there is probable cause to believe WILLIAMS violated § 1343 because there is probable cause to believe his conduct satisfies both elements of the statute: (1) First, that WILLIAMS devised or intended to devise a scheme to defraud or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises that were material; and (2) that for the purpose of executing the scheme, WILLIAMS transmitted or cause to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce any writings, signs, signals, pictures, or sounds.

9. I respectfully submit there is probable cause to believe WILLIAMS violated § 1341 because there is probable cause to believe his conduct satisfies all four elements of the statute: (1) First, that WILLIAMS devised or intended to devise a scheme to defraud or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises that were material; and (2) that for the purpose of executing or attempting to execute the scheme, WILLIAMS, did one of the following (a) placed in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service; (b) deposited or cause to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier; (c) took or receive from any matter or thing whatever delivered by the Postal Service or any private or commercial interstate carrier; or (d) cause to be delivered by mail or private or commercial interstate carrier according to the address on the item any matter or thing whatever.

10. I respectfully submit there is probable cause to believe WILLIAMS violated § 1349 because there is probable cause to believe his conduct satisfies both elements of the statute: (1) Two or more persons, in some way or manner, agreed to try to accomplish a common and

unlawful plan to commit a fraud crime listed in Title 18, Chapter 63, to wit: wire fraud a violation of 18 U.S.C. § 1343, or mail fraud a violation of 18 U.S.C. § 1341, and (2) WILLIAMS knew the unlawful purpose of the plan and willfully joined in it.

### **Background of Federal Investigation**

#### **Package Return Scheme**

11. In September 2023, Home Depot's Corporate Security Investigations (hereinafter referred to as CSI<sup>1</sup>), uncovered a fraudulent scheme whereby a customer obtained merchandise through orders placed online through Home Depot's website. After the merchandise was delivered, the online shipping records of third-party carriers such as UPS or FedEx were then manipulated to appear as if the merchandise was returned, when it was in fact retained by the perpetrator. In reviewing these transactions, CSI investigators noticed three common shipping addresses in the Columbia, South Carolina area: (1) 414 N. Pines Road, Blythewood, SC 29016, (2) 1100 Marthan Road, Blythewood, SC 29016, and (3) TARGET LOCATION (hereinafter referred to collectively as the "Columbia Addresses"). CSI Investigators conducted an analysis of the orders placed using the Columbia Addresses and the following outliers were observed:

- a. Since December 2022, the Columbia Addresses had over 300 orders with associated refunds.
- b. Orders were placed by multiple customer profiles.
- c. Most, if not all, had address with slight and meaningless variations to the Columbia Addresses, such as 414 North Pines Road t, 414 North Pines Road St., 309KT Bradbury Dr., 309a Bradbury Drives, 1100kh Marthan Rd., or 1100 VV MARTHAN RD
- d. The most common name associated to billing/shipping names for orders to 414 N Pines Rd was "TaShaun Williams."

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<sup>1</sup> Corporate Security Investigations is a loss prevention division of Home Depot.

- e. The most common IP address used to place the orders was 45.22.216.181. This IP address was an AT&T address originating from Blythewood, SC.

12. An analysis of the orders placed by the Columbia Addresses showed a refund was issued shortly after the delivery of the merchandise. In reviewing orders sent to the Columbia Addresses, it was found that Home Depot had not received any returned packages containing merchandise.

13. All orders associated with the Columbia Addresses were found to be tendered with over (300) distinct credit/debit cards and additional forms of payments including multiple PayPal accounts. CSI investigators took a small sample of credit/debit card numbers and partnered with the identified financial institutions. A review of the accounts by the financial institutions revealed there were no reports of fraud or compromised accounts.

14. A review of calls to the Online Contact Center<sup>2</sup> (hereinafter referred to as OCC) to initiate the return revealed the same male's voice for all orders/calls as well as DEVICE #1 being identified from the OCC caller-ID. Additionally, for all returned orders, UPS data would only show that a return tracking label had been created but would never show that the merchandise had been returned. In the following weeks, anti-fraud efforts put in place on identified accounts in this scheme forced some returns to be completed in store.

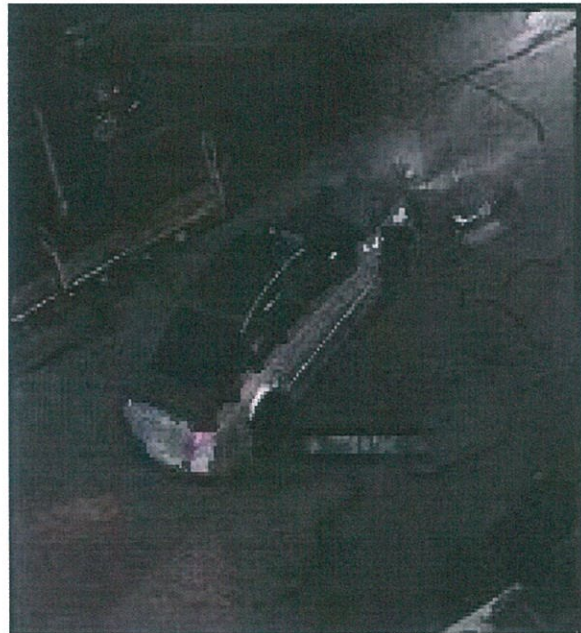
15. When CSI reviewed three store-managed returns associated with the Columbia Addresses, they appeared to each be completed by the same male subject. A review of CCTV footage of the store managed returns revealed a young, black male, with short twists/dreads and earrings completing all three refunds. This individual has been identified as WILLIAMS. WILLIAMS was observed on all three occasions arriving/leaving the stores in the same vehicle: a

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<sup>2</sup> The Online Contact Center is the customer service division of Home Depot.



silver Nissan Altima with missing hub caps on the passenger side. Photographs of WILLIAMS inside Home Depot and his vehicle outside Home Depot are included below:



16. A search of the WILLIAMS profile within Home Depot's sales database revealed WILLIAMS made several purchases at store #1109 in Columbia, South Carolina. In reviewing these purchases, the same individual who conducted the store managed returns, was observed making purchases at store #1109. The sale conducted by WILLIAMS was tendered with a debit card. The name associated to the debit card in Home Depot's computer systems returns to: Tashaun Q Williams. Through open-source resources, Ta'Shaun Q Williams has been associated with all three Columbia Addresses, including TARGET LOCATION.

17. According to SCDMV, 414 N. Pines Road, Blythewood, SC 29016 appears on WILLIAMS' driver's license as his place of residence.

18. On 02/15/24, CSI investigators were able to intercept order (#WJ49913027) destined for TARGET LOCATION. CSI investigators placed a covert GPS tracking device within the merchandise packaging of the order. Delivery of the order was confirmed by both the shipper (FedEx) and the GPS device pinging at the location.

19. On 02/19/24, the same male heard in previous calls contacted the OCC to initiate a return for order #WJ49913027, utilizing DEVICE #1. The male informed the OCC agent he no longer needed the items and wished to have a drop off label created and emailed to him. Fourteen minutes after the initial call to the OCC, the same male, called back and requested the tracking numbers associated to the return tracking label be provided to him verbally.

20. At 16:08 hours, on 02/19/24, UPS data indicated the return tracking label associated to order #WJ49913027, had a pickup scan indicating that the package had been picked up by a UPS driver and was located in Maspeth, NY. Despite UPS' computers showing the item as picked up by a UPS driver and taken to Maspeth, New York, the GPS tracking device showed its location being inside the TARGET LOCATION. Hours later, after receiving the pickup scan information from UPS, Home Depot's systems issued a refund back to the original tender.

21. I submit that it is likely WILLIAMS or a co-conspirator utilized an electronic device to manipulate data in UPS' computer system to indicate the package had been picked up and taken to New York when, in actuality, the package remained at TARGET LOCATION.

22. On 03/07/24, the GPS tracking device on order #WJ49913027 alerted to detecting motion. At approximately 13:35 hours, the device showed it was moving within a vehicle and leaving TARGET LOCATION. At approximately 13:55 hours, the device indicated it was stationary at a Bank of America branch located at 2021 Sunset Blvd West Columbia, SC. At approximately 14:07 hours, the device indicated it left the bank was continuing to travel south on Interstate 26. At approximately 14:24 hours, the device indicated it was once again stationary, this time at a FedEx Freight facility located at 177 Overland Dr West Columbia, SC 29172.

23. FedEx Freight captured WILLIAMS and another male enter the facility on 3/7/24. I was able to identify WILLIAMS from both photo and video captures. It is believed that the other male that was with WILLIAMS was his father, Harry Williams. Video and photos produced by



FedEx Freight showed WILLIAMS and Harry arrive into the parking lot driving a white Sprinter Van. Open-source records revealed that Harry Williams is the registered owner of a white Sprinter Van, the same van that was observed in the photo. Photos of the van and WILLIAMS and his father entering the facility are included below:



24. Per FedEx Freight documents that were provided to me, WILLIAMS produced his SC driver's license and signed his name on a bill of lading for a shipment of packages being delivered to Emil Davit at 16216 Union Tpke. Fresh Meadows, NY 11366. WILLIAMS also presented DEVICE #1 on to the bill of lading as the customer's contact information.

25. On 03/08/24 the GPS tracking device indicated movement and appeared to be traveling to the Northeast part of the country. A delivery was made on 03/12/24 to the Union Mall shopping center located at, 16216 Union Tpke Fresh Meadows, NY 11366. From 03/12/24-03/17/24, the GPS device indicated no movement and appeared to be stationary in the Northwest corner of the shopping mall. On 03/18/24, the GPS tracking device indicated movement and from the events after the start of movement, it appears the device was loaded onto a carrier service provider and making additional pickups in the Queens, NY area.

26. On 03/18/24, at approximately 18:45 hours, the GPS tracking device came to a stop at the UPS Meadowlands NJ Hub. For the next few days, the GPS tracking device showed its location as being the UPS Meadowlands NJ Hub, but there is a possibility that the tracking device did not have enough signal to send out its current location. On 03/25/24, the GPS tracking device indicated its location was at a UPS facility in Round Rock, TX.

27. Throughout the day on 03/25/24, the GPS tracking device appeared to be on a delivery vehicle making several stops. At approximately 15:30 hours, the GPS tracking device indicated it was stationary in a residential area off of Settlement Drive in Round Rock, TX. It is believed this is the final destination or potential residence of an unsuspecting buyer who may have purchased the item.

28. In total, 656 orders have been placed from the Columbia Addresses, including TARGET LOCATION, dating back to December 2022. Of those 656 orders, TARGET LOCATION was listed as the delivery address for a total of 284 deliveries from Home Depot that contained approximately 738 total items. Of the 656 orders, 166 deliveries containing approximately 521 items have been delivered to 414 N. Pines Road, Blythewood SC 29016. Of the 656 orders, 185 deliveries containing approximately 537 items have been delivered to 1100



Marthan Road, Blythewood, SC 29016. As of the date of this affidavit, Home Depot has issued refunds for and not received merchandise back for orders totaling approximately \$647,769.93.

Empty Boxes Scheme

29. On 4/1/24, Home Depot changed their return policy. Before a refund is credited back to the customer, Home Depot must physically examine the return to verify that the correct package is being returned before Home Depot issues a refund. This policy change affected the course of the package return scheme. In response to Home Depot's new policy, Williams and his co-conspirators began ordering lithium battery tools from Home Depot that are listed as "hazmat" due to the lithium.

30. Home Depot does not accept returns of packages with hazmat materials. Instead, Home Depot utilizes third party contractors to discard the hazmat returns. The new fraud scheme is as follows.

31. On 4/22/24, I received information from CSI Investigators that multiple packages were set to be picked up that day at TARGET LOCATION by On Time Services (hereinafter referred to as OTS).

32. OTS is a third-party contractor that delivers and returns packages for large distribution companies across the USA, including Home Depot.

33. OTS has specific instructions from Home Depot that any return that has been listed as "Hazmat" needs to be disposed of at their warehouse.

34. According to CSI Investigators, on 04/13/24, an order was placed via Home Depot's website for a Milwaukee M12 12-Volt Lithium-Ion Force Logic Cordless Press Tool Kit priced at \$2,440.77. Per CSI Investigators, the order was placed by David Lee with a listed address of

TARGET LOCATION, a phone number of 803-679-1170, and an email listed as davidlee80@gmail.com.

35. Every order placed using this new scheme listed TARGET LOCATION as an address and has utilized a fabricated name, phone number, and email address.

36. An additional order was placed on the same date for three Milwaukee M12 12V Lithium-Ion Cordless PVS Shear Kits totaling \$774.36.

37. The items were delivered to TARGET LOCATION by OTS on 4/15/24. On the same day, a phone call was placed from number 803-632-4953 to OCC requesting a refund and return of the aforementioned items.

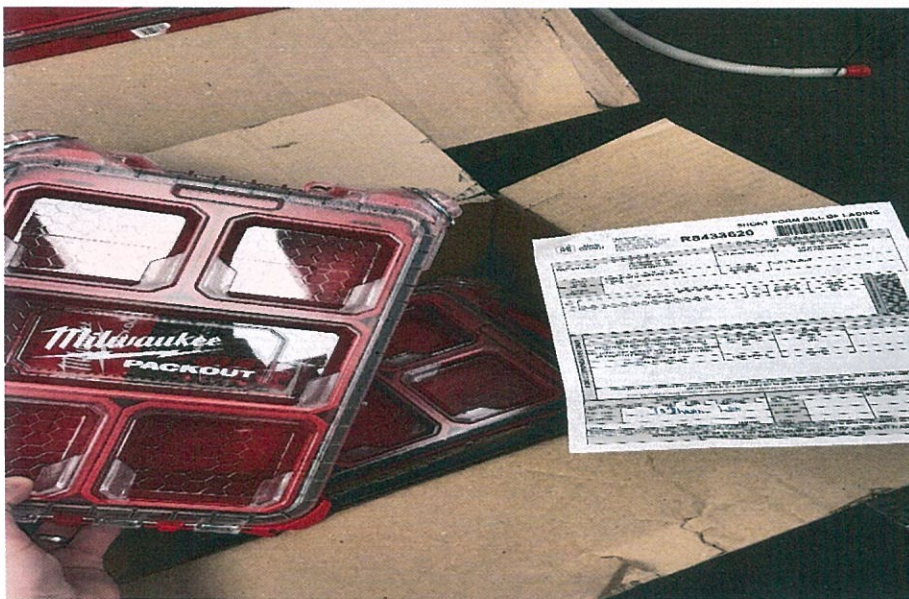
38. On 4/22/24, two packages were picked up by OTS at TARGET LOCATION and were delivered back to the OTS warehouse.

39. Once the packages were picked up by OTS, a full refund was returned to the suspect's credit card.

40. On 4/23/24, I traveled to the OTS warehouse located at 120 Queen Pkwy, West Columbia, SC 29169 to inspect the returned packages. I observed OTS personnel open the packages and I verified that the inside of the packages contained empty Milwaukee Packout toolboxes. The Milwaukee M12 12-Volt Lithium-Ion Force Logic Cordless Press Tool Kit and the three Milwaukee M12 12V Lithium-Ion Cordless PVS Shear Kits were not located in any of the returned packages.

41. I documented and took photos of the shipping boxes and toolboxes. I took possession of one of the Home Depot shipping boxes that contained two Milwaukee Packout toolboxes. The toolboxes and the Home Depot shipping box have been logged-in as evidence at the USSS Columbia Field Office. A photo of the packages as they appeared when picked up by OTS and the packages after they were opened is included below:





42. On 4/9/24 another order was placed for the same items as the 4/13/24 order: one Milwaukee M12 12-Volt Lithium-Ion Force Logic Cordless Press Tool Kit and the three Milwaukee M12 12V Lithium-Ion Cordless PVS Shear Kits, totaling \$3,215.13

43. The items were shipped to TARGET LOCATION on 4/10/24, and the same day, the suspect called OCC using phone number 803-632-4953 and requested to return the items.

44. On 4/12/24, OTS picked up the items from TARGET LOCATION and delivered them back to their warehouse to discard the items since they were listed as “hazmat”.

45. CSI Investigators discovered the return and contacted OTS to have them look inside the boxes. OTS provided CSI Investigators and myself with photos identifying several Milwaukee Packout toolboxes inside of the boxes, but none of the ordered merchandise.

*Refusal of Delivery Scheme*

46. On 4/28/24, CSI Investigators advised me that they planned to deploy another tracker within a package that was set to be delivered to TARGET LOCATION. CSI Investigators explained that they wanted an update on where the packages were being delivered once they left TARGET LOCATION.

47. On 5/6/24, I received a call from CSI Investigators who informed me that earlier that day, an order was placed via Home Depot’s website for several items to be delivered to TARGET LOCATION. The customer listed was a company called Swift Enterprise with a phone number of 809-389-7519 and an email address of davidlewis58@gmail.com. CSI Investigators informed me that there would be a total of seven packages being delivered the following day to TARGET LOCATION.

48. CSI Investigators advised me that they placed a GPS tracker on a Milwaukee M18 Fuel 18V Lithium-Ion Brushless Cordless 1 in. Impact Wrench Extended Reach D-Handle (Order number WG61554945) that was scheduled to be delivered to TARGET LOCATION on 5/7/24.

49. On 5/7/24, I along with South Carolina Law Enforcement Division (SLED) SA Phillips conducted surveillance at TARGET LOCATION to observe the packages being delivered by FedEx.



50. At approximately 1:07 PM on 5/7/24, SA Phillips and I observed a FedEx truck deliver a total of seven packages, including order # WG61554945, to the front doorstep of TARGET LOCATION. The tracker from Home Depot confirmed the same.

51. I observed WILLIAMS exit the residence and take all seven items into TARGET LOCATION. I was able to obtain video and photos of both the delivery of the packages, and the packages being brought inside TARGET LOCATION by WILLIAMS. Photos of WILLIAMS taking the packages inside are included below:



52. On 5/8/24, CSI Investigators informed me that the suspect called the OCC via phone number 803-594-3437 at approximately 08:56 HRS to state that he refused delivery of the packages that were delivered on 5/7/24 at TARGET LOCATION.

53. The tracker that was deployed on package number WG61554945 was still shown to be at TARGET LOCATION at the time of the phone call to OCC.

54. At some point after the delivery of package WG61554945 and the phone call to OCC, FedEx's tracking system data began to show that "recipient refused delivery" of package WG61554945 on 5/7/24. The FedEx data also showed the package was in Lawrence, MA at approximately 21:41 HRS. The tracker indicated package WG61554945 was still located at TARGET LOCATION.

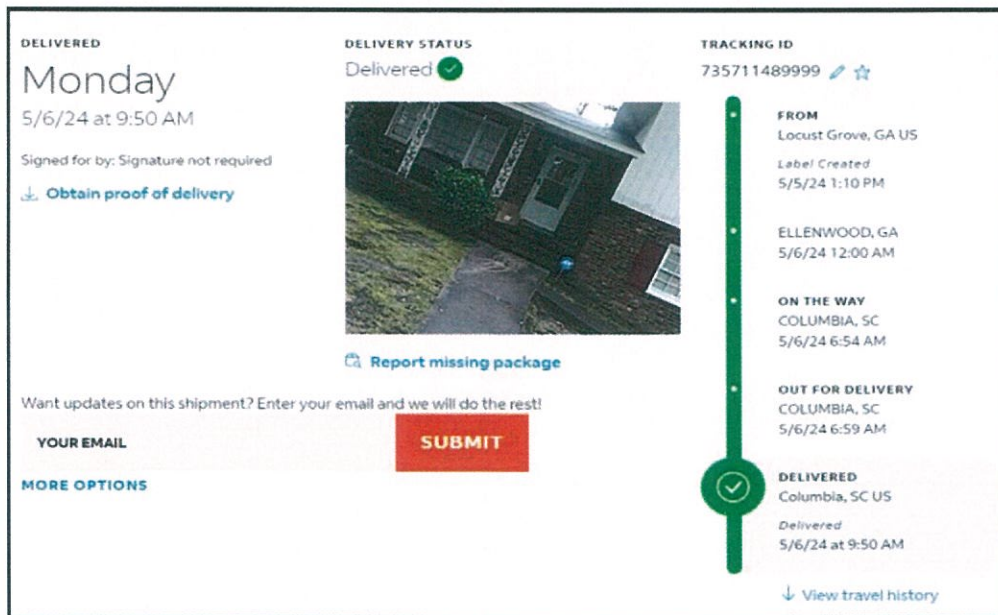
55. I submit it is likely WILLIAMS or one of his co-conspirators used an electronic device to manipulate data in FedEx's computer system to indicate the package was in Lawrence, MA when, in actuality, the package remained at TARGET LOCATION.

56. Once OCC verified through FedEx's tracking system that the order showed "recipient refused delivery", the suspect was immediately issued the refund for \$970.92.

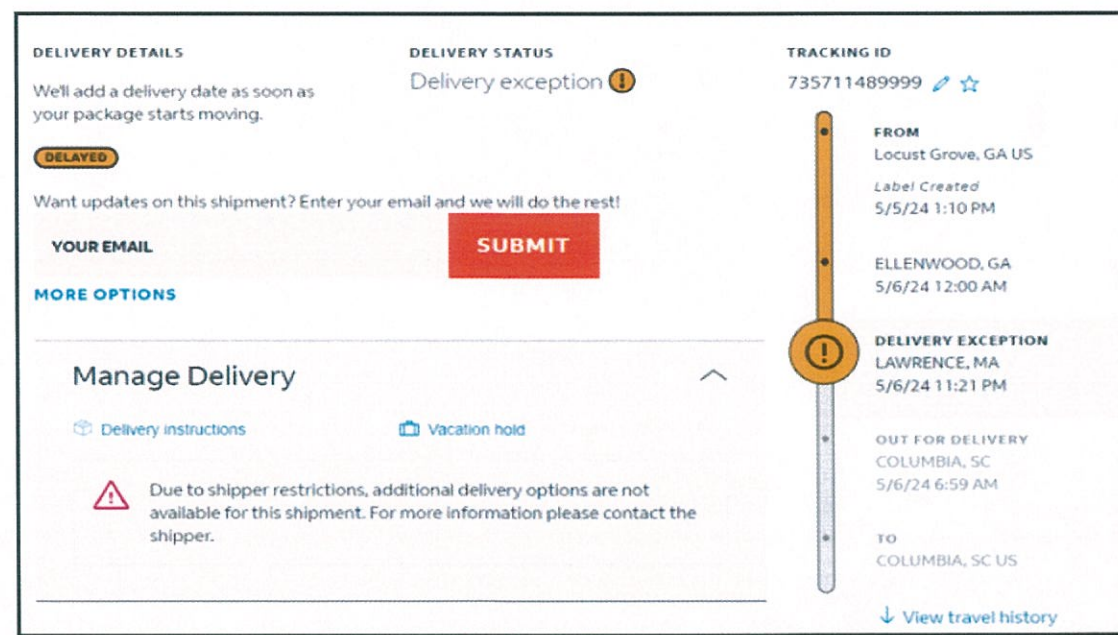
57. On 5/8/24, CSI Investigators who were monitoring the tracker called and informed me that the tracker began moving from TARGET LOCATION. Continuing the same date, the tracker stopped moving at a UPS ground hub located at 1782 Old Dunbar Road, West Columbia, SC 29172.

58. On 5/9/24, CSI Investigators informed me that the tracker left the UPS hub and was later stationary at 238 46<sup>th</sup> Street, Brooklyn, NY 11220. As of the writing of this affidavit, the tracker has not moved from that location.

59. On 5/4/24, an order was placed via Home Depot's website for a Milwaukee M18 Fuel 18V Lithium-Ion Brushless Cordless 1 in Impact Wrench priced at \$970.92 (Order Number WJ54442856). Per CSC Investigators, the order was placed by Justin Moore with TARGET LOCATION listed as the address, phone number 803-672-9061, and an email listed as justinmoore@gmail.com. The order was delivered on 5/6/24 at TARGET LOCATION per FedEx's tracking number with a photo of the delivery on the front doorstep of TARGET LOCATION that was included in the initial tracking information. That photo is included below:



60. On 5/7/24, DEVICE #1 contacted the OCC and stated that he refused the delivery because the boxes were damaged. The tracking number was manipulated by an electronic device to show that the package was not delivered to TARGET LOCATION, but instead the package was in Lawrence, MA. A screenshot of the manipulated tracking information is included below:





61. According to CSI Investigators, on 05/19/24 at approximately 0753hrs, an order was placed via Home Depot's website for a Milwaukee M18 Fuel 18-Volt Lithium-Ion Brushless Cordless 1 in. Impact Wrench priced at \$970.92. Per Home Depot Investigators, the order was placed by Koby Wood with a listed address of 1100 Marthan Road, Blythewood, SC 29016, a phone number of 805-678-3210, and an email listed as kobywood50@gmail.com.

62. On the same date at approximately 10:10hrs, the same item as above was ordered on Home Depot's website. Per CSI Investigators, the order was placed by Monte Dyckes with a listed address of 1100 Marthan Road, Blythewood, SC 29016, a phone number os 805-689-0357, and an email address of montedyckes08@gmail.com.

63. Per CSI investigators, both orders were delivered at 1100 Marthan Road on 5/20/24 at approximately 1440 hrs. The photo of delivery and FedEx's tracking history is shown below:

**DELIVERED**

**Monday**

5/20/24 at 2:40 PM

Signed for by: Signature not required

[Obtain proof of delivery](#)


Want updates on this shipment? Enter your email and we will do the rest!

**YOUR EMAIL**

**MORE OPTIONS**

**DELIVERY STATUS**

Delivered



[Report missing package](#)

**SUBMIT**

**TRACKING ID**

742967995900

**FROM**

Locust Grove, GA US

Label Created

5/19/24 10:58 AM

**ELLENWOOD, GA**

5/20/24 12:00 AM

**ON THE WAY**

COLUMBIA, SC

5/20/24 7:11 AM

**OUT FOR DELIVERY**

COLUMBIA, SC

5/20/24 7:25 AM

**DELIVERED**

Blythewood, SC US

Delivered

5/20/24 at 2:40 PM

[View travel history](#)

64. Per CSI Investigators, on 5/21/24, phone number 803-893-3135 contacted the OCC and stated that he refused the delivery of the above order. The tracking number was manipulated to show that the packages were not delivered to 1100 Marthan Road, Blythewood, SC 29016 and instead, the packages were in Minneapolis, MN. The subject was issued the full refund by Home Depot. A screenshot of the manipulated tracking information is included below:

The screenshot displays a tracking page for a Home Depot shipment. It is divided into three main sections: Delivery Details, Delivery Status, and Tracking ID.

- DELIVERY DETAILS:** Includes a message "We'll add a delivery date as soon as your package starts moving." and a form to "Want updates on this shipment? Enter your email and we will do the rest!" with a "SUBMIT" button. Below this is a "MORE OPTIONS" link.
- DELIVERY STATUS:** Shows "Delivery exception" with a red exclamation mark icon.
- TRACKING ID:** Displays the tracking number "742967995900" with edit and favorite icons.

A vertical timeline on the right side of the page shows the shipment's progress:

- FROM:** Locust Grove, GA US, Label Created 5/19/24 10:58 AM.
- ELLENWOOD, GA:** 5/20/24 12:00 AM.
- DELIVERY EXCEPTION:** MINNEAPOLIS, MN, 5/20/24 4:49 PM (This entry is highlighted with a red box and a red exclamation mark icon).
- OUT FOR DELIVERY:** COLUMBIA, SC, 5/20/24 7:25 AM.
- TO:** BLYTHEWOOD, SC US.

At the bottom right, there is a link to "View travel history".

Below the tracking timeline, there is a "Manage Delivery" section with links for "Delivery instructions" and "Vacation hold". A warning message states: "Due to shipper restrictions, additional delivery options are not available for this shipment. For more information please contact the shipper."

### III. PROBABLE CAUSE

65. Based on the facts set forth in this affidavit and my knowledge, background, and experience, I submit there is also probable cause to believe WILLIAMS currently resides at TARGET LOCATION and that there is likely evidence such as electronic devices, phones, computers, hard drives, shipping labels, receipts, documentation of orders and returns, fraudulently obtained Home Depot merchandise, and Home Depot packages that remain at the residence.

66. I further submit there is probable cause violations of Title 18 United States Code Section 1343 (wire fraud), Title 18 United States Code Section 1341 (mail fraud), and Title 18

United States Code Section 1349 (conspiracy to commit wire fraud and mail fraud) have been committed. I also submit that there is probable cause to believe that the information sought within the TARGET LOCATION, will constitute evidence and will lead to the conclusive identification of the individual or individuals who are engaged in the commission of these offenses.

67. Multiple surveillance operations at TARGET LOCATION have identified WILLIAMS currently residing at this location. On multiple occasions, WILLIAMS has ordered Uber Eats, and he was seen exiting TARGET LOCATION to retrieve the food.

68. WILLIAMS has also been observed exiting TARGET LOCATION to retrieve multiple deliveries from FedEx and UPS on multiple occasions.

69. There are currently no registered vehicles in for WILLIAMS in South Carolina but WILLIAMS has been observed driving a black Nissan Altima bearing tag number VNG466 and the silver Nissan Altima picture at Home Depot for in-store returns. The same black Nissan Altima has been observed at TARGET LOCATION every time WILLIAMS has been observed there.

70. I submit there is probable cause to believe that Williams keeps electronic devices, including computers, cellular devices, hard drives, electronic storage mediums, fraudulently obtained Home Depot merchandise, Home Depot packages, and records of Home Depot orders at TARGET LOCATION.

71. For each online order that is placed by a customer, Home Depot internal databases captures IP addresses, and devices that have placed the order.

72. CSI Investigators internal databases have determined that the online orders have been placed utilizing iPhones (iOS 17.3.1, iOS 17.0.1) and desk top computers (Windows 10) from 2022 to present day.

73. Home Depot Investigators provided me with IP addresses from where the orders were being placed. The most recent, and most common IP addresses provided was IP:



75.189.122.98, and IP: 75.176.248.203. Law enforcement databases revealed the IP addresses belonged to Charter Communications.

74. On 4/10/24, I served Charter Communications with a Grand Jury subpoena for information pertaining to IP: 75.189.122.98, and IP: 75.176.248.203.

75. On 5/14/24, Charter Communications confirmed that IP: 75.189.122.98 belonged to TARGET LOCATION with the subscriber's name as Roderick Williams. Roderick Williams is the brother of WILLIAMS.

76. Charter Communications also confirmed that IP: 75.176.248.203 belonged to 414 N. Pines Road, Blythewood, SC 29016 with the subscriber's name Kiara Robinson. Kiara Robinson is the mother of WILLIAMS.

77. On 4/14/24, AT&T confirmed that IP:45.22.216.181 belonged to 414 N. Pines Road, Blythewood, SC 29016 with the subscriber's name as Kiara Robinson. Per AT&T, this IP address began services at 414 N. Pines Road, Blythewood, SC on 6/1/23.

78. If agents are able to search the TARGET LOCATION, I submit agents would likely recover evidence of violations of the Target Offenses.

79. I further submit there is probable cause to believe WILLIAMS is a resident of TARGET LOCATION. Williams has been observed spending the night at TARGET LOCATION as recently as 5/7/24 and has commonly been observed at TARGET LOCATION during the evening and overnight hours by multiple surveillance operations at TARGET LOCATION. Further, there is evidence that WILLIAMS is living with his father, Harry Williams, and his brother, Roderick Williams at TARGET LOCATION.

80. I submit there is probable cause to believe the search of TARGET LOCATION, and WILLIAMS would likely produce relevant and probative evidence, to include fraudulently obtained merchandise from Home Depot, Home Depot packages, receipts, shipping labels, packing

slips, and other documentation related to fraudulent orders. Furthermore, a search of TARGET LOCATION and WILLIAMS would likely identify or confirm the identity of others who have been involved in this conduct with WILLIAMS and the other co-conspirators. The search would also identify packages from Home Depot that were supposedly picked up by UPS or FedEx that are still remaining at TARGET LOCATION. Finally, records and things obtained from the requested searches would likely corroborate WILLIAMS' involvement in the specific schemes and fraud incidents described below.

#### **IV. INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

81. This warrant seeks permission to seize any computers, cellular phones, electronic storage mediums, and other electronic devices, receipts, boxes, shipping labels, and any other items associated with Home Depot, FedEx, On Time Services, or UPS described in Attachment B, that are located within the TARGET LOCATION, as described in Attachment A. If and when these computers, electronic storage mediums, and cellular phones are located and seized, a separate search warrant will be sought and applied for to request permission to conduct a forensic analysis on said computers, phone(s), storage mediums, and other electronic devices where they can be more specifically described and identified.

#### **V. CONCLUSION**

82. Based on the above, I respectfully request the Court issue the proposed warrant requested pursuant to Federal Rule of Criminal Procedure 41 and other authority cited herein. Further, I believe there is probable cause to believe that the federal criminal statutes cited herein have been violated, and that the contraband, property, evidence, fruits, and instrumentalities of this offense, more fully described in Attachment B, are located at the location described in Attachment A. I respectfully request that this Court issue a search warrant for the location described in Attachment A, authorizing the seizure and search of the items described in Attachment B.

This affidavit has been reviewed by Assistant United States Attorney Scott Matthews.

I swear, under penalty of perjury, that the forgoing is true and correct to the best of my knowledge.

Respectfully Submitted



Jordan Vaughan  
Special Agent  
U.S. Secret Service

SWORN TO ME VIA TELEPHONE OR  
OTHER RELIABLE ELECTRONIC MEANS  
AND SIGNED BY ME PURSUANT TO  
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),  
AS APPLICABLE.

This 24<sup>th</sup> day of June, 2024  
Columbia, South Carolina



The Honorable Paige J. Gossett  
UNITED STATES MAGISTRATE JUDGE